

Message

From: Baris, Reuben [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A0181E3F02A246FC915A4AF026E249FC-BARIS, REUBEN]
Sent: 10/1/2018 5:38:10 PM
To: Schmid, Emily [Schmid.Emily@epa.gov]
Subject: RE: today
Attachments: 524-617 EPA label edits.pdf

Hey Emily.

Yes they should be up to date. One thing to note, the Engenia label is already at 0.5 lbs/app. 2 lbs total in crop for soy and cotton.

One thing that I haven't been able to do yet that I think you can help with is to examine how BASF has structured their label. As in I think they attempted to only apply the "restrictions" to only the DT soy and DT cotton uses leaving it ambiguous for all the other uses. In contrast Bayer/Monsanto applied the restrictions to all uses. I'd personally like to see both held to the same standard (the restrictions apply to all uses).

I attached the Bayer label to this email, maybe that will help with your comments too. I'm preparing to send the comments to Bayer but I'd like to do both at the same time.

Thanks for your help! Give me a call or chat if you have any questions.
Reuben

REUBEN BARIS | PRODUCT MANAGER, TEAM 25 | HERBICIDE BRANCH
U.S. ENVIRONMENTAL PROTECTION AGENCY, OFFICE OF PESTICIDE PROGRAMS | (703) 305-7356

From: Schmid, Emily
Sent: Monday, October 01, 2018 12:22 PM
To: Baris, Reuben <Baris.Reuben@epa.gov>
Subject: RE: today

Hi Reuben,

I'm going to finish my review of the Engenia label since I didn't get too far last week. Are these still the current changes? If so, is this right? (Note: they changed total postemergence to 25.6, 1 lb)

Maximum Application Rates in DT Cotton

Application Timing	Amount (fl ozs/A)
Single Preplant Preemergence Postemergence	12.8 (0.5 lb dicamba ae/A)
All Applications Combined Total per Season	51.2 (2 lbs dicamba ae/A)
Total Preplant and Preemergence	25.6 (1 lb dicamba ae/A)
Total Postemergence	51.2 (2 lbs dicamba ae/A)

Maximum Application Rates in DT Soybean

Application Timing	Amount (fl ozs/A)
Single Preplant Preemergence Postemergence	12.8 (0.5 lb dicamba ae/A)
All Applications Combined Total per Season	51.2 (2 lbs dicamba ae/A)
Total Preplant and Preemergence	25.6 (1 lb dicamba ae/A)
Total Postemergence	25.6 (1 lb dicamba ae/A)

Thanks,
Emily

From: Baris, Reuben
Sent: Tuesday, September 25, 2018 9:54 AM
To: Meadows, Sarah <Meadows.Sarah@epa.gov>
Cc: Schmid, Emily <Schmid.Emily@epa.gov>
Subject: RE: today

Well congrats on making it 40 weeks! If for whatever reason we don't see you before baby-boy-meadows arrives...good luck!

The list should be very close to the "final decision." Though there is talk about revisiting the cut off date. Not sure where that is coming from and how serious it is...will know more at noon. I'm reattaching the list for convenience.

REUBEN BARIS | PRODUCT MANAGER, TEAM 25 | HERBICIDE BRANCH

From: Meadows, Sarah
Sent: Tuesday, September 25, 2018 9:51 AM
To: Baris, Reuben <Baris.Reuben@epa.gov>
Cc: Schmid, Emily <Schmid.Emily@epa.gov>
Subject: RE: today

Yes! 40 weeks today.

Is the list you sent yesterday the 'final decision' as we know it for label changes?

From: Baris, Reuben
Sent: Tuesday, September 25, 2018 9:48 AM
To: Meadows, Sarah <Meadows.Sarah@epa.gov>
Cc: Schmid, Emily <Schmid.Emily@epa.gov>
Subject: RE: today

That would be helpful.

Is today your due date? If so, happy due-date-day! (that's a thing right?)

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From: Meadows, Sarah
Sent: Tuesday, September 25, 2018 9:47 AM
To: Baris, Reuben <Baris.Reuben@epa.gov>
Cc: Schmid, Emily <Schmid.Emily@epa.gov>
Subject: RE: today

Ugh, it's not too early. It's a great day for a baby to come, right on time.

Sure, 1 pm works for me. Do you want one of us to do a thorough label review? I can work on that if we are at that point.

From: Baris, Reuben
Sent: Tuesday, September 25, 2018 9:44 AM
To: Meadows, Sarah <Meadows.Sarah@epa.gov>
Cc: Schmid, Emily <Schmid.Emily@epa.gov>
Subject: RE: today

Thanks Sarah.

I saw you weren't in and panicked. It's too Early!

Maybe you me and Emily can chat today at some point (1pm?) on the two labels? BASF and Bayer?

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From: Meadows, Sarah
Sent: Tuesday, September 25, 2018 9:28 AM
To: OPP RD HB <OPP_RD_HB@epa.gov>
Subject: today

Hi, HB. I'm working from home today, and am off tomorrow. I can be reached at Ex. 5 Deliberative Process (DP) if you need me.

Sarah

Sarah True Meadows, PhD
US Environmental Protection Agency
Office of Pesticide Programs
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